



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 90-97-TV

Plant ID: 0109

Effective Date: 27 November 2000

Expiration Date: 27 November 2005

UTM Northing: 4229.6

UTM Easting: 608.3

SIC: 3715

NAICS: 336212

AFS: 00109

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Kentucky Manufacturing Company
2601 South 3rd Street
Louisville KY 40208-1408

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Kentucky Manufacturing Co

Responsible Official: Larry A. Hartog

Title of Responsible Official: President

Date Application Received: 15 December 1994

Date Application Administratively Complete: 23 February 1995

Date Public Notice Given: 2 July 2000

Reviewing Engineer (42)

Air Pollution Control Officer

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Abbreviations and Acronyms

| | |
|------------------|---|
| AC | - Additional Condition |
| AFS | - Airs Facility Subsystem |
| AIRS | - Aerometric Information Retrieval System |
| APCD | - Air Pollution Control District |
| ASL | - Adjusted Significant Level |
| atm | - Atmosphere |
| BACT | - Best Available Control Technology |
| Btu | - British Thermal Unit |
| °C | - Degrees Centigrade |
| CEMS | - Continuous Emission Monitoring System |
| CAAA | - Clean Air Act Amendments (15 November 1990) |
| cf | - Cubic foot |
| DOE | - District Only Enforceable |
| °F | - Degrees Fahrenheit |
| gal | - Gallon |
| HAP | - Hazardous Air Pollutant |
| Hg | - Mercury |
| hr | - hour |
| lbs | - Pounds |
| l | - Liter |
| MACT | - Maximum Achievable Control Technology |
| m | - Meter |
| mg | - Milligram |
| mm | - Millimeter |
| MM | - Million |
| MOCS | - Management of Change System |
| NAICS | - North American Industry Classification System |
| NSR | - New Source Review |
| NO _x | - Nitrogen oxides |
| NSPS | - New Source Performance Standards |
| PM | - Particulate Matter |
| PM ₁₀ | - Particulate matter less than 10 microns |
| ppm | - Parts per million |
| PSD | - Prevention of Significant Deterioration |
| PMP | - Preventive Maintenance Plan |
| psia | - Pounds per square inch absolute |
| RACT | - Reasonably Available Control Technology |
| SIC | - Standard Industrial Classification |
| SIP | - State Implementation Plan |
| SO ₂ | - Sulfur dioxide |
| TAL | - Threshold Ambient Limit |
| TAP | - Toxic Air Pollutant |
| tpy | - Tons per year |
| UTM | - Universal Transverse Mercator |
| VOC | - Volatile Organic Compound |

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
 - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
 - b. Have access to and copy records required by this permit.
 - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
 - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
(Regulation 2.16, section 4.3.2)
14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year.

All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For

purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
 26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
 27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
 28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
 29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
 30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
 31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
 32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
 33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

| FEDERALLY ENFORCEABLE REGULATIONS | |
|-----------------------------------|---|
| Regulation | Title |
| 1.01 | General Application of Regulations and Standards |
| 1.02 | Definitions |
| 1.03 | Abbreviations and Acronyms |
| 1.04 | Performance Tests |
| 1.05 | Compliance with Emission Standards and Maintenance Requirements |
| 1.06 | Source Self-Monitoring and Reporting |
| 1.07 | Emissions During Startups, Shutdowns, Malfunctions, and Emergencies |
| 1.08 | Administrative Procedures |
| 1.09 | Prohibition of Air Pollution |
| 1.10 | Circumvention |
| 1.11 | Control of Open Burning |
| 1.14 | Control of Fugitive Particulate Emissions |
| 2.01 | General Application |

| FEDERALLY ENFORCEABLE REGULATIONS | |
|--|--|
| Regulation | Title |
| 2.02 | Air Pollution Regulation Requirements and Exemptions |
| 2.03 | Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits |
| 2.07 | Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits |
| 2.09 | Causes for Permit Suspension |
| 2.10 | Stack Height Considerations |
| 2.11 | Air Quality Model Usage |
| 2.16 | Title V Operating Permits |
| 4.01 | General Provisions for Emergency Episodes |
| 4.02 | Episode Criteria |
| 4.03 | General Abatement Requirements |
| 4.07 | Episode Reporting Requirements |
| 5.01 | General Provisions (for Hazardous Air Pollutants) |
| 5.03 | Potential Hazardous Emissions |
| 6.01 | General Provisions (for <i>Existing Affected Facilities</i>) |
| 6.02 | Emission Monitoring for Existing Sources |
| 7.01 | General Provisions (for <i>New Affected Facilities</i>) |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | |
|--|---|
| Regulation | Title |
| 1.12 | Control of Nuisances |
| 1.13 | Control of Objectionable Odors in the Ambient Air |
| 2.08 | Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees |
| 8.03 | Commuter Vehicle Testing Requirements |

Emission Unit U-1 Description: Boilers

Two industrial boilers for plant heating. Each boiler uses natural gas for the primary fuel and #2 distillate oil for secondary fuel.

Applicable Regulations:

| Federally Enforceable Regulations | | |
|--|--|---|
| Regulation | Title | Sections |
| 7.06 | Standards of Performance for New Indirect Heat Exchangers | 1, 2, 3, 4, 8 |
| 40 CFR 60 Subpart A | General Provisions | 60.1 through 60.19 |
| 40 CFR 60 Subpart Dc | Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units | 60.40c, 60.41c, 60.42c(d), 60.44c(g), 60.46c(e), 60.48c(d) (e)(g)(i)(j) |

| District Enforceable Regulations | | |
|---|--|------------------|
| Regulation | Title | Sections |
| 7.02 | Federal New Source Performance Standards Incorporated by Reference | 1.11, 2, 3, 4, 5 |

Allowable Emissions:

| Pollutant | Standards |
|------------------|-------------------------------|
| PM | See Additional Condition 1.a. |
| Opacity | See Additional Condition 1.b. |
| SO ₂ | See Additional Condition 1.c. |

Components:

E1- One 21 MM Btu/hr boiler, vented out stack number S-1

E2- One 14 MM Btu/hr boiler, vented out stack number S-2

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. PM** (Regulation 7.06, section 4.1.4)

The owner or operator shall limit PM emissions to 0.29 lb/MMBtu for emission points E-1 and E-2.

b. Opacity (Regulation 7.06, section 4.1.4)

The owner or operator shall not cause emissions which exhibit greater than 20% opacity except:

- i. for indirect heat exchangers with a heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than two consecutive minutes in any 60 consecutive minutes;
- ii. for indirect heat exchangers with heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than six consecutive minutes during cleaning the fire box or blowing soot; or
- iii. for emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

c. SO₂ (Regulation 7.06, section 5.1.1 and 40 CFR 60 Subpart Dc)

- i. The owner or operator shall limit SO₂ emissions to 1.0 lb/MM Btu for emission points E1 and E2. (Regulation 7.06, section 5.1.1)
- ii. The owner or operator shall not allow the maximum sulfur content of #2 fuel oil, by weight, to exceed one half percent (0.5%), and this shall be done by supplier's certification of the sulfur content. (40CFR60.42c(d))

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)**a. PM**

There are no compliance monitoring requirements for this pollutant. (See Comment 2).

b. **Opacity**

The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks), when combusting fuel oil. No more than four Emission Points shall be observed simultaneously. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practicable steps to eliminate the exceedance.

c. **SO₂**

- i. For the standard 1.c.i., see Comment 1.
- ii. For the standard 1.c.ii., see Additional Condition 3.c.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **PM**

See Comment 2

b. **Opacity**

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed.

c. **SO₂** (40 CFR 60 Subpart Dc)

- i. The owner or operator shall keep records of fuel purchase records that show heating value and sulfur content for fuel oil. (40CFR60.44c(g))
- ii. The fuel supplier certification shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40CFR60.41c. (40CFR60.48c(e)(11))
- iii. The owner or operator shall keep records of the amount of fuel combusted each day. (40CFR60.48c(g))

4. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report semi-annually the following:

a. PM

There are no compliance reporting requirements for this pollutant.

b. Opacity

- i. Emission Unit ID number, Stack ID number, and/or Emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. Description of any corrective action taken for each exceedance

c. SO₂

- i. Emission Unit ID number, Stack ID number, and/or Emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedance of the 30 day average sulfur content of the fuel oil
- iv. Description of any corrective action taken for each exceedance

Comments

1. Calculations of SO₂ emissions, based on the applicable AP-42 emission factor, demonstrate that the SO₂ emission standard cannot be exceeded when using 0.5% S fuel oil and operating at design capacity; therefore, no additional recordkeeping or monitoring is required.
2. Calculations of PM emissions, based on the appropriate AP-42 emission factor, demonstrate that the PM emissions standards for each emission point cannot be exceeded when operating at design capacity; therefore, no additional recordkeeping or monitoring is required.

Emission Unit U-2 Description: Painting

Total painting operations for semi-trailers

Applicable Regulations:

| Federally Enforceable Regulations | | |
|--|---|-----------------|
| Regulation | Title | Sections |
| 1.05 | Compliance with Emission Standards and Maintenance Requirements | 1, 3, 4, 5 |
| 1.18 | Rule Effectiveness | 1, 2, 3 |
| 7.08 | Standards of Performance for New Process Operations | 1, 2, 3 |
| 7.25 | Standard of Performance for New Sources using Volatile Organic Compounds | 1, 2, 3, 4, 5 |
| 7.59 | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations | 5.1.3 |

| District Enforceable Regulations | | |
|---|---|------------------|
| Regulation | Title | Sections |
| 5.12 | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants | 1, 2, 3, 4, 5, 6 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2, 3 |

Allowable Emissions:

| Pollutant | Standards |
|------------------|-------------------------------|
| PM | See Additional Condition 1.a. |
| Opacity | See Additional Condition 1.b. |
| VOC | See Additional Condition 1.c. |
| TAP | See Additional Condition 1.d. |

Components:

E5- Floor coating area, Fugitive emissions

E6- Touch-up painting area, Fugitive emissions

E10- Prime booth, controlled by water wall mist eliminators to remove particulate matter, vented out stacks S-101 through S-104

E11- Topcoat booth, controlled by water wall mist eliminators to remove particulate matter, vented out stacks S-111 through S-114

E12- Repass booth, controlled by water wall mist eliminators to remove particulate matter, vented out stacks S-121 through S-124

E13- Undercoat booth, controlled by water wall mist eliminators to remove particulate matter, vented out stacks S-131 through S-134

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. PM** (Regulation 7.08, section 3.1.2)

The owner or operator shall not allow PM emissions from E-10 through E-13 to exceed 2.34 lbs/hr for each emission point.

b. Opacity (Regulation 7.08, section 3.1.1)

The owner or operator shall not allow the discharge of emissions in excess of 20% opacity.

c. VOC

i. The owner or operator shall not allow VOC emissions to exceed 171.26 tons in any consecutive 12 month period from all emission points. (See comment 2)

ii. The owner or operator shall not coat more than 34 vehicles or trailers per day in order to be exempt from Regulation 7.59, section 5.1.3.

iii. The owner or operator shall not exceed 36.06 tpy from emission point E5 according to the BACT analysis submitted on October 24, 1997.

d. TAP (Regulation 5.12)

The owner or operator shall not allow TAP emissions to exceed the ASL, unless BACT or modeling is performed.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)**a. PM**

See Additional Condition 3.a.

b. Opacity

The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks). No more than four Emission Points shall be observed simultaneously. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours

of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, according to Regulation 1.07, and take all practicable steps to eliminate the exceedance.

c. **VOC**

See Additional Condition 3.c.

d. **TAP**

See Additional Condition 3.d.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **PM**

The owner or operator shall maintain monthly records of paint applied and booth operating hours to demonstrate compliance with the hourly PM standard.

b. **Opacity**

The owner or operator shall maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed.

c. **VOC**

i. The owner or operator shall maintain daily records of the VOC emissions and calculate the of the monthly and consecutive 12 month total VOC emissions from emission points E5, E6, E10-E13 to demonstrate compliance with additional condition 1.c.i.

ii. The owner or operator shall maintain daily production records to demonstrate compliance with additional condition 1.c.ii.

iii. The owner or operator shall maintain daily records of the VOC emissions from emission point E5 and calculate the monthly VOC emissions to demonstrate compliance with additional condition 1.c.iii.

d. **TAP**

The owner or operator shall calculate and record monthly TAP emissions using a 30-day material balance, and ascertain that the adjusted significant level (ASL) has not been exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report semi-annually the following:

a. **PM**

- i. Emission Unit ID number and Emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedances of the hourly PM emission standard for each emission point including the quantity of excess emissions
- iv. Description of any corrective action taken for each exceedance

b. **Opacity**

- i. Emission Unit ID number and Emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 that exceeded the opacity standard
- iv. Description of any corrective action taken for each exceedance

c. **VOC**

- i. Emission Unit ID number and Emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. Identify the monthly VOC emissions, the 12 consecutive month total, and all periods of exceedances of the VOC or production limit
- iv. Description of any corrective action taken for each exceedance

d. **TAP**

- i. Emission Unit ID number and Emission point ID number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedances of the ASL
- iv. Description of any corrective action taken for each exceedance

Comments

1. Emission Points E-5, E-6, and E-10 through E-13 commenced operation after May 20, 1981. These emission points meet the exemption level set in Regulation 7.59, section 5.1.3.
2. The 12-month rolling total VOC emission limit is in accordance with Kentucky Manufacturing's application for permit, Form 9400-E. It is to avoid the requirements of Regulation 2.04 Construction or Modification of Major Sources in or Impacting upon Non-attainments Areas (Emission Offset Requirements).
3. Emission Points E-10 through E-13 are subject to Regulation 7.08, as operation commenced after September 1, 1971.

Emission Unit U-3 Description: Steam Cleaning

One steam cleaning process using applicators and a chemical mixing station

Applicable Regulations:

| Federally Enforceable Regulations | | |
|--|---|-----------------|
| Regulation | Title | Sections |
| 1.05 | Compliance with Emission Standards and Maintenance Requirements | 1, 3, 4, 5 |
| 7.25 | Standards of Performance for New Sources Using Volatile Organic Compounds | 1, 2, 3, 4, 5 |

| District Enforceable Regulations | | |
|---|---|------------------|
| Regulation | Title | Sections |
| 5.12 | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants | 1, 2, 3, 4, 5, 6 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2, 3 |

Allowable Emissions:

| Pollutant | Standards |
|------------------|-------------------------------|
| VOC | See Additional Condition 1.a. |
| TAP | See Additional Condition 1.b. |

Components:

E7- Application area and mixing equipment, vented out stacks S7 and S8.

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)a. **VOC** (Regulation 7.25, section 2.1)

The owner or operator shall not allow VOC emissions to equal or exceed 5 tpy.

b. **TAP** (Regulation 5.11)

The owner or operator shall not allow TAP emissions to exceed the ASL, unless BACT or modeling is performed.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1)a. **VOC**

See Additional Condition 3.a.

b. **TAP**

See Additional Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)a. **VOC**

The owner or operator shall maintain records of the monthly VOC emissions. Daily records shall indicate the quantity of cleaning products used, and the VOC content, by weight, to demonstrate compliance with the annual emission limit.

b. **TAP**

The owner or operator shall calculate and record monthly TAP emissions using a 30-day material balance, and ascertain that the adjusted significant level (ASL) has not been exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report semi-annually the following:

a. **VOC**

- i. Emission Unit ID number and Emission point ID number
 - ii. The beginning and ending date of the reporting period
 - iii. Identify the monthly VOC emissions, the 12 consecutive month total, and all periods of exceedances of the VOC limit
 - iv. Description of any corrective action taken for each exceedance
- b. **TAP**
 - i. Emission Unit ID number and Emission point ID number
 - ii. The beginning and ending date of the reporting period
 - iii. Identification of all periods of exceedances of the ASL
 - iv. Description of any corrective action taken for each exceedance

Emission Unit U-4 Description: Stage I gasoline fueling station

Stage I gasoline fueling station consisting of one 1,000 gallon above ground unleaded gasoline storage tank

Applicable Regulations:

| Federally Enforceable Regulations | | |
|--|--|--|
| Regulation | Title | Sections |
| 7.15 | Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery) | 1, 2, 3.1, 3.3, 3.4, 3.6, 3.7, 3.8 and 5 |

| District Enforceable Regulations | | |
|---|--|-----------------|
| Regulation | Title | Sections |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2, 3 |

Allowable Emissions:

| Pollutant | Standards |
|------------------|-----------------------------|
| VOC | See Additional Condition 1. |

Components:

E8- Stage I gasoline fueling station consisting of one 1,000 gallon above ground unleaded gasoline storage tank

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)**VOC** (Regulation 7.15, section 3)

- a. The owner or operator shall install, maintain and operate the storage tank with a submerged fill pipe, vent line restrictions, a vapor balance system, and vapor tight connections on the liquid fill and vapor return hoses.
- b. The owner or operator shall not allow delivery of fuel to the storage tanks until the vapor balance system is properly connected.
- c. The owner or operator shall not allow delivery of gasoline to a service station without connecting the vapor return hose between the tank of the truck and the storage tank receiving the product.
- d. The owner or operator shall maintain all above ground tanks with dry breaks
- e. The owner or operator shall operate and maintain equipment with no defects and all fill tubes shall be equipped with vapor-tight covers including gaskets; all hoses, fittings and couplings shall be in vapor-tight condition; and all dry breaks shall have vapor tight seals and shall be equipped with vapor tight covers or dust covers.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1)**VOC**

No monitoring requirements

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)**VOC**

No recordkeeping requirements

4. **Reporting** (Regulation 2.16, section 4.1.9.3)**VOC**

No compliance reporting requirements

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-Permit Documents

Document

1.18 Rule Effectiveness plan

Date

December 13, 1994

Alternative Operating Scenario

The company requested no alternative operating scenario in its Title V application.

| Source-Wide HAP Speciation | | | |
|----------------------------|----------|--------------------------------|-----------|
| HAP | CAS No. | HAP | CAS No. |
| 2, 4-Toluene Diisocyanate | 584-84-9 | Benzene | 71-43-2 |
| Ethyl Benzene | 100-41-4 | Formaldehyde | 50-00-0 |
| Glycol Ethers | NA | Hydrogen Fluoride | 7664-39-3 |
| Methanol | 67-56-1 | Methyl Ethyl Ketone | 78-93-3 |
| Methyl Isobutyl Ketone | 108-10-1 | Phosphoric Acid | 7664-38-2 |
| Polycyclic Organic Matter | NA | Toluene | 108-88-3 |
| m-Xylene | 108-38-3 | o-Xylene | 95-47-6 |
| p-Xylene | 106-42-3 | Xylenes (isomers and mixtures) | 1330-20-7 |

| Insignificant Activities | | |
|--|-----------------|--------------------------------|
| Description | Quantity | Basis |
| Gasoline powered forklift fleet | 1 | Regulation 2.02, section 2.2 |
| Minor Fuel Combustion Units (Space heaters) | 23 | Regulation 2.02, section 2.1.1 |
| Air make-up systems for paint booths (Minor Fuel Combustion) | 2 | Regulation 2.02, section 2.1.1 |
| Brazing, soldering, or welding equipment | Various | Regulation 2.02, section 2.3.4 |

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
 - ii. No periodic monitoring shall be required for facilities designated as insignificant activities.